

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**VICTOR HASSINE, SAMUEL
HASSINE,**

Plaintiffs,

VS.

**LT. LARRY SHERMAN and
SECRETARY JEFFREY BEARD,
in their official capacities,**

Defendants.

Civil Action No. 03-212E

Judge McLaughlin
Magistrate Judge Baxter

MOTION FOR EXTENSION OF TIME

AND NOW, come the defendants, Lt. Larry Sherman and Secretary Jeffrey Beard, by their attorneys, Thomas W. Corbett Jr., Attorney General, Craig E. Maravich, Deputy Attorney General, Susan J. Forney, Chief Deputy Attorney General, Chief, Litigation Section, and plaintiff's Victor Hassine and Samuel Hassine, by their attorney, Jere Krakoff, and respectfully submit the following:

1. Plaintiff, by and through his attorney, brings this federal civil complaint.
2. Plaintiff wishes to depose a 30(b)(6) witness as well as numerous other witnesses.
3. Undersigned counsel is scheduled to begin trial on October 31, 2005 and begin a second trial on November 7, 2005.
4. Discovery is scheduled to end on October 31, 2005.
5. Due to scheduling issues, the parties request an extension of time for all deadlines.

6. The parties have exchanged discovery responses.

7. Certain depositions are scheduled to take place beyond the discovery deadlines. Presently, depositions are scheduled for November 18th and 21st, 2005 and December 2nd and 5th, 2005.

8. An extension of time of 60 days for discovery is requested.

CONCLUSION

WHEREFORE, it is respectfully requested this motion be granted.

/s/ Craig E. Maravich
CRAIG E. MARAVICH
Deputy Attorney General
Pa. I.D. #86219

SUSAN J. FORNEY
Chief Deputy Attorney General
Chief, Litigation Section

OFFICE OF ATTORNEY GENERAL
6th Floor, Manor Complex
564 Forbes Avenue
Pittsburgh, PA 15219

Date: October 19, 2005

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2005, I electronically filed the foregoing ***Motion to Extend Time*** with the Clerk of Court using the CM/ECF system.

By: /s/ Craig E. Maravich
CRAIG E. MARAVICH
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